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The Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

July 30, 1994

Ref: CC Docket 92-77
Further Notice of Proposed Rulemaking
Comments

Due August 1, 1994

RECEIVED
AUG 1 1994

Dear Mr. Secretary:

Please file the enclosed comments with the Commission regarding this
Docket & FNPR.

Sincerely,


Daniel J. Rooks

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Billed Party Preference) CC Docket No. 92-77
for 0+ InterLATA Calls)

RECEIVED

AUG 1 1994

Comments to Further Notice of Proposed Rulemaking

FCC MAIL ROOM

Date July 26,1994

By: Daniel J. Rooks
An Interested Individual
Representing typical users of payphone services
4250 Blackland Drive
Marietta, GA 30067

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I. Introduction

1. In May of 1992 the Commission released a Notice of Public Rule Making (NPRM) to consider the implementation of a "Billed Party Preference (BPP) system for O+ interLATA payphone traffic¹. At that time the Commission tentatively concluded that it would be in the public interest.

2. I have read the Further Notice of Proposed Rulemaking (FNPR)², & have concluded that BPP would indeed serve the public interest. I believe that BPP would stimulate competition in operator services. This would happen primarily by refocusing Operator Service Providers on their primary purpose, which is to assist consumers in the completion of their calls & the use of the network. I believe that the benefits far outweigh the costs. From my perspective, I believe that most parties affected by the costs of the system changes, can & will obtain a 100% payback of their investment in three (3) years or less. Some will be able to amortize their costs in as little as one (1) year³.

3. Should the Commission not approve BPP, I believe it must provide other protection for the traveling public & payphone users from the Aggregators & Operator Service Providers (A & OSP) that continue to charge excessive fees that far exceed the maximum AT & T rates.

4. The Commission is urged, by the writer, to provide temporary protection to payphone users until the full implementation of BPP (estimated three years, January 1998)⁴ is reached.

¹ Notice of Proposed Rule Making, CC Docket No. 92-77, 7 FCC Rcd 3027 (1992) (Notice).

² Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19, 1994

³ It stands to reason that certain long distance carriers such as MCI will benefit more from BPP & others such as AT&T will benefit a lesser amount due to a lessened competitive advantage. See Para. 31 & 32 to reference Return-On-Investment which can easily run 36% & higher.

⁴ In the FNPR CC Docket No. 92-77 May 19, 1994 Sec. G., Para. 83, The Commission estimates a three year time frame after the final Commission mandate for BPP. For my calculation I have used the date of January 1995 as a possible date of this mandate. The FCC Estimate is June 1997 for their estimates (Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19, 1994, P. 6, Para. 8).

II. Background

5. As a user of payphone service while traveling, I have been surprised by the rapid growth of Aggregator & 3rd tier OSP's. While I don't have access to exact statistics on a nationwide basis, I can talk specifically about the areas in the Midwest & Southeast regions of the country, that I find myself in. Three years ago I seldom encountered a payphone, (one you could put money into) that was owned by someone other than the Local Exchange Carrier (LEC). I don't want to say never, just seldom.

6. Last month I visited a restaurant in Marshall, Michigan & used their payphone to place 6 interLATA calls⁵. I used my Bell South Calling Card to pay for these calls. When the bill came in, I noticed three of the calls cost \$8.68 each.

7. I recognized the called number as my home. I remembered the particulars of the 3 calls. I had called home to reach our son. Each time got my answering machine & immediately hung up. After looking over my bill, I got mad! \$8.68 times 3 to reach an answering machine! Looking farther I could see that each time I had used a pay phone provided by a an Non LEC, I was charged far more than the AT&T rate for service.

8. This initial problem, got me looking into the question of how a 5 second call could cost \$8.68. The search lead me from Bell South, to the OSP, Zero Plus Dialing to the Federal Communications Commission through Enforcement to Tariffs to Several Senators & Congressmen & back to the restaurant owner. I've come to recognize how difficult it is for Mr. & Ms. Ordinary Jones, to deal with an abusive OSP.

9. I have spent thousands of dollars in non-billable time & out of pocket expenses to find out that Mr. & Ms. Ordinary Jones, has in fact, no recourse, to overcharging by an OSP⁶.

10. I was delighted to read the FNPR for BPP. This docket represents a clear,

⁵See Attached Bell South Telephone Bill, for Daniel J. Rooks dated Jun 4, 1994, Exhibit A.

⁶See Attached Letter From Zero Plus Dialing, Exhibit B.

well thought out approach. I found the language, tone, & intent strikingly different from other TOCSIA dockets⁷. In particular, I find BPP Docket No. 92-77 to be very pro consumer & in the public interest. The TOCSIA Dockets & Orders, on the other hand, tended to very lenient toward the A & OSP's.⁸

III. Costs & benefits of Billed Party Preference

11. The Commission has taken what I believe to be an exceedingly conservative view on both costs & benefits. That is, projecting higher costs & lower benefit revenues, then would actually occur. This is normally not a bad approach. However in this case, I believe that this method would fail to demonstrate the true benefits of BPP. The writer urges the Commission to utilize more current, "real world" data in constructing its pricing model.

A. Benefits.

12. The writer agrees with the commission as to the three principle benefits of BPP being:

- *Facilitate access to the telephone network by simplifying most operator assisted calls.
- *Lead OSP's to refocus their efforts on serving end users.
- *Enable AT & T competitors to compete more effectively for customers that choose not to use access codes & 800 or 950 nmbrs.

13. I disagree with the Commission's estimate that the first two benefits would generate roughly \$620 million⁹, annually in gross quantifiable savings. The actual savings will be much higher than the Commission estimates. My own estimates approach \$2,510,000,000¹⁰. This is approximately 4 times the

⁷FCC Report & Order CC Docket 90-313 April 9,1991 & Order On Reconsideration FCC 92-247 & 92-275

⁸Lenient by offering the A &OSP's up to 5 years to replace equipment that blocked access if it costs more than \$15.00 per line & not requiring more stringent reporting of efforts to unblock lines.

⁹ Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19,1994, P. 6, Para. 8

¹⁰See following para. 13 -17 &Appendix A. I believe the net result of these changes in the pricing model the Commission used would generate approx. \$2,510,000.00 in gross quantifiable savings.

Commissions estimate.

14. The Commission has relied extensively on TOCSIA Table 4¹¹ to determine that in 1997 OSP's will; generate 7.7 billion in operator services, 18.1% of their revenues from interLATA calls, experience a 50% dial-around rate, generate 3.2 Billion in interLATA 0+ revenues, pay 12% in commissions from aggregator phones, make 380 million in commission payments.

15. I have two primary problems with the assumptions used by the Commission. The first is that the Commission assumes a straight line growth of 4.3%¹² per year in revenues generated by 3rd tier OSP's. This fails to take into account the significant changes that have occurred in market share between 1991 & 1997. The writer does not have access to the actual growth by OSP Category but based on published industry information, it could easily exceed 20% per year. The second issue is that the Commission utilized in their model, OSP rates an AT&T average rate of \$0.34,¹³ per minute. then projected a straight line growth. Neither of these two assumptions can be supported by fact. As a side note I have seen almost a doubling in most non-LEC OSP rates just in the last year.

16. The facts are that, AT&T's current 1994 operator assisted, day time rate is \$1.07 and early night rate is \$.99¹⁴. This is about 3 times the basic rate used in the underlying assumptions, indicating almost a 300% change from the \$0.34 used in TOCSIA Table 4. Furthermore some Long Distance carriers are quoting rates as low as \$.119¹⁵ per minute & this is before the competitive effects of BPP.

¹¹Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19,1994, P. 41, Appendix B

¹²Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19,1994, P. 41, Appendix B

¹³Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19,1994, P. 41, Appendix B

¹⁴Per 7-15-1994 phone call to AT &T requesting their rates for this class service.

¹⁵See Attached Exhibit C, copy of Metromedia notice to & agreement with the Commercial Travelers Association rates from \$0.16 to \$0.175 per minuet. Exhibit D shows Information & Telephone Services quoting rates of \$0.119.

17. The above AT&T rates demonstrate a rate of tariff inflation higher than 4.3%.¹⁶ It is possible that other causal factors which the model doesn't take into accounts responsible for this difference

18. The model fails to take in account that many 3rd tier OSP's currently charge as much as 867% (8.67% times) more that AT&T¹⁷ would charge on interLATA calls. This generates OSP revenues & commissions paid in this category, higher than the Commission is estimating.

19. The model fails to take into account the vast difference, 3rd tier non-LEC, OSP's are charging for interstate calls Vs. intrastate calls¹⁸. I seldom have a problem with intrastate call tariffs. Frequently I see OSP's will charge an interstate call rate much higher than an intrastate rate¹⁹. The difference between the cost of accessing the interstate long distance exchanges, does not begin to justify this vast difference. I have concluded that the single difference, is that with intrastate calls, the OSP must file for tariffs with the State PSC. These tariffs are generally reviewed for fairness & other tests.

20. Meanwhile the interstate tariffs the OSP's file with the FCC, are not reviewed, or subject to any scrutiny. The OSP files an "Informational Only"²⁰ tariff. The FCC allows the OSP to file a blanket maximum rate or a rate range, which as long as the OSP doesn't exceed this number, the OSP doesn't need to refile. This, I believe, is a primary cause of some of the difficulties, with which the Commission now grapples.

21. The private payphone industry is growing in market share at an

¹⁶A \$0.34 rate per minute allowing growth @ 4.3% would indicate approximately a \$0.10 increase to \$0.43 per minute. If the Commission's 1991 estimate is correct that the rate was \$0.34 per minute in 1991, then the rate of increase is about 300% over 3 years or or 600% over 6 years show

¹⁷ See Attached Bell South Telephone Bill, for Daniel J. Rooks Dated jun 4, 1994, Exhibit A.

¹⁸ See Attached Bell South Telephone Bill, for Daniel J. Rooks Dated jun 4, 1994, Exhibit A.

¹⁹ See Attached Bell South Telephone Bill, for Daniel J. Rooks Dated jun 4, 1994, Exhibit A.

²⁰ 47 U.S.C Para 226(h)(1)(A)

unprecedented rate. Any change in market share will have a phenomenal effect on projected savings. The model, the Commission is using, does not adequately take into account this radically changing market. I urge the Commission to find more accurate data supporting these radical market shifts.

22. This growth in market share of Aggregators & 3rd tier OSP's is not surprising when you think about it. What competition is an LEC to an independent supplier with a good marketing program? Not much!

23. To understand this situation, you have to put yourself in the place of each of the players in the market. There are 3 or some times 4 players. First we have a somewhat stodgy LEC. I mean no offense by this description of its marketing. The LEC has been there since Alexander Graham Bell. LEC are not known for their marketing skills. The LEC is strapped by a multitude of rules, constraints & procedures, imposed by the FCC, PSC, SEC, its owner, managers, & stockholders. Second we have the premises owner. If you own a restaurant & want a payphone, you have to in many cases, beg or plead to get one. You may be required to pay for it, stand behind any damages to it, plus pay monthly charges. This gets worse as you want 2, 3 or 4 payphones. Third we have the independent payphone operator & his sales rep. Fourth we have the OSP or in some cases another Aggregator.

24. It's Monday morning & the rep from the independent payphone company is calling on you the restaurant owner. This is a first. You have never had someone actually trying to SELL you on using their payphones. The salesman says "Mr. Smith, I'm John Sellmore from Acme Payphones. I noticed you are using A.G. Bell's payphones. Would you mind sharing with me, how much does A.G. Bell Co. pay you each month for allowing them to put their payphone on your premises?" You say somewhat incredulously "Well, they don't pay me anything."

25. "Nothing?! Well Mr. Smith allow me to show you how hundreds of other smart businessmen, like yourself, are turning a loss into a profit center, all at no cost to you."

26. I beg the Commission's indulgence on this little bit of satire. However, it does enable the Commission, to see more clearly an example of what is happening in the real world. This & other marketing approaches are played out thousands of times per year all over the U.S. I believe the Commission will find,

as I have, that this example offers an insight into how the explosive growth of the independent pay phone companies & OSP's has occurred.

27. The Commission has requested comment on the question of how convenient or confusing are access codes. Like 800 & 950 numbers, access codes are additional numbers that one must use. If a caller is making only one call, they appear to be of some bother & inconvenience. People being different, you will no doubt get many answers to this question. I know a person that can keep a phone number in his head, that he has not used it in years. Many others like myself, need to look up a number that has not used frequently. I personally find that it causes me problems that just don't need to exist. Many others have found supporting evidence of this.²¹

28. For a person making numerous Long Distance phone calls, these extra numbers are a nightmare. If you are in a hotel or behind a PBX it can be almost impossible to place Dial Around calls I experienced this as recently as two months ago at the Sheraton Chicago Hotel & Towers in Chicago, IL. I have tried to explain to each of my 6 children, how to bypass the "payphone rip-off" by using 10XXX, 800 & 950 numbers. In each case I was left with sort of a blank stare & disbelief that it takes dialing that many numbers just to use a payphone for long distance calls charged to my Bell South calling card number.

B. Estimated Costs of BPP

29. The Commission has estimated that by requiring implementation of BPP the cost could be 1.1 Billion in non recurring charges & 60 million in annual recurring charges. The writer does not feel qualified to say with certainty that this is too much or too little. However, I would like the Commission to consider the following in subtractions from its calculations of the costs associated with BPP.

30. Some or even most of the costs of BPP could have already been budgeted for charged to other programs, by the affected parties. For example, the Commission might want to look at: 5 year Planned Infrastructure Upgrades, Normal Depreciation & Replacement of Equipment, Telecommunications Super Highway Programs, DOD & Government Programs, Large User mandated

²¹ Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19, 1994, P. 6, Para. 8 Note 21 Pacific Comments at 8 regarding Focus Group research.

programs, ANI Deployment Programs, New Business Development Programs such as Fiber Optics, Cable, ETC. If for example, a switch has been slated for replacement in 1996, as part of a firm's normal service upgrade program, we shouldn't charge 100% of this to BPP. The same thing applies to software improvements.

31. It is interesting to compare BPP & other similar service upgrades to upgrades in other industries. This comparison may not provide hard numerical data, but I believe it does help to clarify this subject. In 1980, the banks did not have many Automated Teller Machines (ATM). The banks said at that time, because the high costs of the the ATM's, they were going to charge for their use. Last week I read that ATM's represent, the single largest profit center to most banks. ATM's return 36% on their investment. They are far cheaper then the cost of using live tellers. This even includes the fraud, theft & liability problems they create. I believe, that in years to come most IXC's, LEC's & OSP's will view BPP as profit enhancing service that will produce a significant return on investment.

32. Any return on investment, from BPP should be shared with stockholders & the public through rate reductions. If it is true, as the Missouri PSC asserts²²,.... "if OSS7 is needed for BPP, costs should be recovered from BPP," then the Commission & state regulators should mandate rate reductions concurrent with its amortization. I urge the Commission to include this provision for future rate reductions along with the final BPP ruling.

33. As to the question of the effect of quality of O+ service, I don't believe that the effect will be any more than the OSP & Participating LEC's allow it to be. This seems to be a function of software. The developers of this software should be encouraged to meet call handling times set up in accordance with industry standards. Software can run fast or run slow depending on the effort that was put into its development. I mention this only as a caveat, that if an A & OSP is allowed to slow the pass through of calling card information & speed the call completion using his service, he probably will.

34. I find while traveling that many small OSP's & Aggregators take considerable time (20 to 30 Seconds) in checking the validity of my calling card.

²² Further Notice of Proposed Rule Making, CC Docket No. 92-77, May 19,1994, P. 14, Para 22 & Note 40

The new BPP requirements should improve service like this, not degrade it.

35. I would like to see BPP expanded to include Interstate calls, as well as prepaid calls made with a credit card or paid for at the time of call with cash. This buyer deserves the right to choose his long distance supplier based on the grade of service or costs, as much as the 0+ user. Just because someone doesn't have a calling card because of their economic situation, age or they are a visitor here doesn't mean they should be treated with any less care or concern than a possessor of a calling card.

IV. Alternatives to BPP

36. While BPP, goes a long way toward solving many of the complaints of consumers it does not address some of the main areas of complaints. What consumers are objecting to is extremely high priced or over priced phone calls. The rate per minute, is only part of what prices these calls. As an example, an Aggregator could charge an access fee of \$2.00 per phone call on all long distance calls. A & OSP's have a number of "Income Enhancing Techniques."²³ One common one that I find to be particularly obnoxious is to apply a minimum charge of say 3 minutes to a call no matter how short, the connected call is. One could argue that BPP will take care of this by allowing the Billed Party to Dial Around this high priced carrier. However the fact is that most people are not aware of vast pricing inequalities. In fact most people feel there isn't that much difference between carriers. The AT&T television ad, about Pennies in Difference, goes to confirm this mistaken general belief.

37. The only alternative to BPP that I am aware of is the requirement for full tariff review with the FCC. It is clear, that we can't expect people to drive a 65 MPH without rules. Furthermore you can't expect people to obey rules no matter how explicit, such as "65 MPH" without some type of enforcement. What if we had the 65 MPH law without any police? Would you drive 65 MPH? This is the sad state of affairs we find ourselves in today.

38. The FCC sets out rules under TOCSIA & expects all OSP's to drop call blocking, but provides no means by which OSP's are required to report on their efforts or lack of efforts to stop call blocking. Enforcement is not given the assignment or budget to discover & report back to the commission on call blocking. Complaints to LEC's & FCC Enforcement have skyrocketed in the last 3

²³See Para. 43

years. The writer disagrees with the total complaint calculations made by the FCC. Because of the subjective nature of classifying complaints, considerable error exists. I argue that the actual number is much higher. Many complaints that are logged under "Rate Complaints" are actually "OSP Complaints." Further more the complaint numbers don't begin to address the tens of thousands of complaint calls fielded by the LEC's. Few people are told to "Call the FCC At This Number ...202-632-7553." Fewer call, thinking..."What's the use?"

39. Under TOCSIA, OSP's are allowed until 1997 to remove call blocking if it costs more than \$25.00 per line. In the mean time consumers are being over charged \$25.00 in less than 3 minutes of use of a call blocked line! This results in a profit of billions of dollars until 1997 or '98.

40. Approximately 12 years ago the FCC decided to no longer require Full Tariff filings from other than the big 3 (AT&T, MCI & Sprint). The thought was that competition will keep the small guys from charging more than the big 3. This was a fair assumption. However it just doesn't apply to payphones. Generally speaking one is captive in a payphone. the telecommunications world has changed faster than the Commission has been able to address the issues. Today we have OSP's charging far more than AT&T would have dreamt was possible.

41. I am asking the Commission to reconsider its rules regarding Full Tariff Review, The Agency costs of this should be covered by its fee schedule. I reject the argument that it would cost small OSP's too much money to prepare & file the necessary documents.

42. If you can't afford to be in the business, you shouldn't be in the business. I would like to own a TV station. I don't have one because I can't afford it. That doesn't entitle me to ask the Commission to waive the costs of licensing, engineering or allow me to go to Harris, Sony or Ikegami & get broadcasting equipment for free.

43. Regardless of whether the Commission approves BPP or not, it has to provide some immediate relief to the buyers of payphone services. If the state PSC's can achieve a substantial rate reduction through review, than so can the Commission. I recommend immediate full rate reviews for all OSP's & Aggregators, unless they can demonstrate that their current rate structure is less than the average of the big 3. Furthermore, they should be required to report on

"Income Enhancing Techniques" such as Minimum Charges, First Minute Charges, Information calls, Equipment use charges & Billing time that starts with the dialing sequence or first ring, as opposed to a completed connection, ETC.

44. This review should include rate fairness & competitive analysis. Allowing one company to charge significantly more than another for similar services is not in the public interest for regulated companies.

45. The tariff filings could continue but be limited to the point in time at which the commission determines that there is indeed full access & a competitive environment exists within the Payphone market. After BPP is in effect and the results measured the Tariff Reviews could be modified or reduced.

46. Lastly, as much as I hate to increase regulatory enforcement. I believe this has to be addressed. No cops, means no speed limits. I agree with the Commission's assessment that it has broad enough powers of enforcement, I just don't believe that there is enough "speeding tickets" being issued. The abuses of deregulation has costs consumers billions of dollars & it will continue until the Commission acts to control the offenders. Giving the offenders years to stop overcharging is not an acceptable solution to Mr. & Ms. Ordinary Jones.

V. Conclusion

47. I support the Commission's tentative findings that BPP would be in the public interest. I believe that it would better facilitate access to the network by eliminating Access codes, 800 & 950 numbers to reach my preferred billing preference. It appears that it would greatly stimulate competition. The Network would undoubtedly be improved. I urge the Commission's immediate action on this matter.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read "Dan Rooks", with a stylized, flowing script.

Daniel J. Rooks

APPENDIX A

Benefit Analysis

	FCC Estimate	My Estimate
Category I		
Callers who do not use access codes		
AT&T (avg.) rate	\$0.34 Per Min.	\$1.00 Per Min. Note 1
3rd Tier Rate	\$0.53 Per Min.	\$2.00 Per Min. Note 2
Minimum Difference	\$0.19 Per Min.	\$1.00 Per Min.
Maximum Difference		\$8.56 Per Min. Note 3
1991 OSP Revenues	\$6.10 Billion	\$6.10 Billion
1991 3rd Tier revenues	\$1.20 Billion	\$1.20
Excess AT&T Avg. Revenue Charged	\$430.00 Million	\$600.00 Million Note 4
1997 Annual Market Growth Rate	4.30% Per Annum	4.30% Per Annum Note 5
Market Share Change '91-'97	0.00% Per Annum	20.00% Per Annum Note 6
1997 3rd Tier Revenues	\$1.50 Billion	\$4.60 Billion Note 7
Market share change in 3rd tier OSP change from 12.7% of traffic: Due to Dial Around	-8.50% Decline	20.00% Increase
Estimated Value	\$280.00 Million	\$1.47 Billion Note 3

Note 1. Per AT&T Phone Quote 7/15/94

Note 2. Phone Bill Attached Exhibit A Even though we see some rates 8.68 X AT&T rates, we are using 2 tier

Note 3. This is based on recent observation of a \$8.68 rate for a less than 1 min. call that could have been completed for for as low as \$0.119. See ITS Rate Exhibit D

Note 4. We used the same calculation as the FCC of $\$100/\$2.00 = 50\%$ of Revenues times 1.2 Billion. attributable to 3rd Tier OSP

Note 5. This does not include Real Market Growth from the efforts of hundreds of new salesmen selling new & additional phones. As the installed base increase availability & use increase.

Note 6. This is due to increased sales & marketing efforts by A & OSP's (See APCC growth statistics)

Note 7. This is compounding a 4.3% Traffic Growth & a 20% market share growth rate.
This is a similar number to published industry estimates

Note 8. \$1.00 rate difference is 5.27 times the \$0.19 Rate Difference the FCC uses. our rate is determined by actual usage., therefore $5.27 \times 280 \text{ mil} = 1.47 \text{ Bil}$

APPENDIX A Continued.

	FCC Estimate	My Estimate
Category II		
Commission Savings		
1991 OSP Revenues	\$6.10 Billion	\$6.10 Billion
1991 3rd Tier revenues	\$1.20 Billion	\$1.20
1997 Annual Market Growth Rate	4.30% Per Annum	4.30% Per Annum
Market Share Change '91-'97	0.00% Per Annum	20.00% Per Annum Note 9
1997 Actual Revenues	\$1.50 Billion	\$4.60 Billion Note 10
Commission Payments	\$340.00 Million	\$1.04 Billion Note 11
Total Quantifiable Savings	\$620.00 Million	\$2.51 Billion

Note 9. This is due to increased sales & marketing efforts by A & OSP's (See APCC growth statistics)

Note 10. This is compounding a 4.3% Traffic Growth & a 20% market share growth rate.

Note 11. the FCC uses \$340 Million which is 22.6% of 1.5 Billion. We used 22.6% of \$4.6 Billion

Exhibit A

** INTEGRTEL, INC. **

Account Number: 404-953-3058 106 0355

Bill Date: Jun 4, 1994 SMYR

Page 19

Calling Card Calls

Date	Place Called	Number Called	*Rate	Time	Min.
LONG DISTANCE PROVIDER - FT. WAYNE PAYPHONES					
1. MAY 5	DIR ASST	MI 616 555-1212	ADC	1250PM	1
	FR FORT WAYNE	IN 219 471-3360			
2. MAY 5	HOLLAND	MI 616 335-5894	ADC	1251PM	3
	FR FORT WAYNE	IN 219 471-3360			
3. MAY 5	SMYRNA	GA 404 953-3058	ADC	1255PM	6
	FR FORT WAYNE	IN 219 471-3360			
4. MAY 5	DIR ASST	GA 404 555-1212	ADC	101PM	1
	FR FORT WAYNE	IN 219 471-3360			
5. MAY 5	ATLANTA	GA 404 284-5770	ADC	103PM	8
	FR FORT WAYNE	IN 219 471-3360			
6. MAY 5	ATLANTA	GA 404 284-5770	ADC	128PM	4
	FR FORT WAYNE	IN 219 471-3360			

Subtotal

Total Charge for Itemized Calls 24.21

Taxes

7. Federal Tax

Subtotal

Integretel, Inc. Current Charges

Helpful Numbers for Integretel, Inc.

Billing Questions 1-800-736-7500

This portion of your bill is provided as a service to Integretel, Inc. There is no connection between Southern Bell and Integretel, Inc.

*Rate Applied - See Back of Page

HV 050260

(continued)

AMOUNT	TOTAL
	<u>AT&T</u>
2.86	.50
3.31	1.61
5.06	2.42
2.86	.50
6.09	2.96
4.03	1.88
<u>24.21</u>	<u>9.87</u>
	24.2
.73	.7
	24.9

ONCOR

Account Number: 404-953-3058 106 0355
 Bill Date: Jun 4, 1994 SMYR
 Page 20

Calling Card Calls

*Date Place Called Number Called *Rate Time Min.*

LONG DISTANCE PROVIDER - ONCOR

1. MAY 9 CLEARWATER FL 813 446-3567 ADS 1133AM 2
 FR ATLANTA GA 404 352-9731

Subtotal

Total Charge for Itemized Calls 8.11

Taxes

2. Federal Tax

Subtotal**ONCOR Current Charges****Helpful Numbers for ONCOR**

Billing Questions 1-800-864-2149

AMOUNT	TOTAL
	<u>AT&T</u>
8.11	1.34
	8.11
.24	
	.24
	8.35

This portion of your bill is provided as a service to ONCOR. There is no connection between Southern Bell and ONCOR.

Rate Applied - See Back of Page

HV 050260

(continued)►



Account Number: 404-953-3058 106 0355
Bill Date: Jun 4, 1994 SMYR
Page 21

Calling Card Calls

<i>Date</i>	<i>Place Called</i>	<i>Number Called</i>	<i>*Rate</i>	<i>Time</i>	<i>Min.</i>
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LONG DISTANCE PROVIDER - OPTICOM/ONE CALL COM

1.	MAY	6	SMYRNA	GA 404	953-3058	AES	816PM	3	*
			FR MARSHALL	MI 616	781-1980				
2.	MAY	6	SMYRNA	GA 404	953-3058	AES	832PM	3	*
			FR MARSHALL	MI 616	781-1980				
3.	MAY	6	HUNTERTOWN	IN 219	637-8181	AES	833PM	3	*
			FR MARSHALL	MI 616	781-1980				
4.	MAY	6	INFORMATN	IN 219	555-1212	AES	836PM	2	
			FR MARSHALL	MI 616	781-1980				
5.	MAY	6	FREMONT	IN 219	495-2266	AES	837PM	3	*
			FR MARSHALL	MI 616	781-1980				
6.	MAY	6	SMYRNA	GA 404	953-3058	AES	841PM	3	*
			FR MARSHALL	MI 616	781-1980				
7.	MAY	12	SMYRNA	GA 404	953-3058	ADS	118PM	3	*
			FR FORT WAYNE	IN 219	483-9709				

NOTE

ATTN
CHARGE/1
.99

LONG DISTANCE PROVIDER - CONQUEST OP SVC CORP

8. MAY 4 SMYRNA GA 404 988-0088 ADS 1133AM 3
FR CORBIN KY 606 528-9093

Subtotal

58.52

Total Charge for Itemized Calls **58.52**

Taxes

9. Federal Tax

Subtotal

1.76

Zero Plus Dialing, Inc. Current Charges

60.28

Helpful Numbers for Zero Plus Dialing, Inc.

Billing Questions 1-800-460-0756

This portion of your bill is provided as a service to Zero Plus Dialing. There is no connection between Southern Bell and Zero Plus Dialing.

*Rate Applied - See Back of Page

HV 050260

(continued)▶

NOTE: * EACH OF THESE CALLS WERE MADE I REACHED MY ANSWERING MACHINE I IMMEDIATELY HUNG UP WITHOUT LEAVING A MESSAGE!



Account Number: 404-953-3058 106 0355
 Bill Date: Jul 4, 1994 SMYR
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Calling Card Calls

Date	Place Called	Number Called	*Rate	Time	Min.	AMOUNT	TOTAL
LONG DISTANCE PROVIDER - OPTICOM/ONE CALL COM							
1. JUN 18	FISHERS	IN 317 577-8079	ANS	633PM	2	1.09	
	FR FORT WAYNE	IN 219 747-4890					
				IN STATE TAX		.05	
2. JUN 18	SO MILFORD	IN 219 351-3956	ANS	737PM	11	2.10	
	FR FORT WAYNE	IN 219 747-4890					
				IN STATE TAX		.11	
3. JUN 19	FISHERS	IN 317 577-8079	ANS	711AM	2	1.09	
	FR FORT WAYNE	IN 219 747-4890					
				IN STATE TAX		.05	
4. JUN 19	HUNTERTOWN	IN 219 637-8181	ANS	713AM	2	.67	
	FR FORT WAYNE	IN 219 747-4890					
				IN STATE TAX		.03	
5. JUN 19	MARTINSVL	IN 317 342-8196	ANS	715AM	2	1.11	
	FR FORT WAYNE	IN 219 747-4890					
				IN STATE TAX		.06	
6. JUN 19	WOODSTOCK	GA 404 924-3634	ANS	717AM	1 *	4.69	
	FR FORT WAYNE	IN 219 747-4890					
7. JUN 19	SMYRNA	GA 404 953-3058	ANS	718AM	2	5.32	
	FR FORT WAYNE	IN 219 747-4890					
LONG DISTANCE PROVIDER - CINCINNATI BELL L.D.							
8. JUN 1	SMYRNA	GA 404 953-3058	ADS	1249PM	11	3.77	
	FR FORT WAYNE	IN 219 747-7321					
9. JUN 6	SMYRNA	GA 404 953-3058	ADS	249PM	1 *2	1.07	
	FR FORT WAYNE	IN 219 747-7321					
10. JUN 6	DIR ASST	GA 404 555-1212	ADS	250PM	2	1.55	
	FR FORT WAYNE	IN 219 747-7321					
11. JUN 6	MARIETTA	GA 404 973-4800	ADS	251PM	4	1.88	
	FR FORT WAYNE	IN 219 747-7321					

*Rate Applied - See Back of Page

HV 050676

(continued)

*1 NOTE HOW RATE JUMPS FOR MINIMUM USE VS INTRA-STATE CALLS ABOVE

*2 NOTE HOW LOW LEC CALLS ARE

Exhibit B

ZERO PLUS DIALING INC.
P.O. Box 791285
SAN ANTONIO, TEXAS 78279-1285

20

DATE: 06/21/94

ELAINE ROOKS
4250 BLACKLAND DR
MARIETTA, GA 30067
ATTN: DAN

RE: Account number (404) 953-3058

Amount disputed \$44.81 plus tax

Bill Date 06/04/94

Dear Customer:

In reference to the above account number, bill date, and disputed amount, Zero Plus Dialing Inc. cannot issue credit due to the following:

Your request for a rate adjustment has been denied because the carrier identified themselves during the processing of the call(s). This afforded you the opportunity to disconnect the call(s) without incurring charges. Rates were also available upon request. In addition, carriers are required to file a tariff of their rates and services with the FCC and they must be authorized as required in each state in which they provide service. Charges are designed to recover the cost of leasing the network facilities, anti-fraud software, employee salaries and benefits, and maintenance and capital costs.

If you have any questions and/or comments relating to this inquiry and the subsequent results, please contact one of our Customer Service Representatives at 1-800-456-7587. Our business hours are Monday through Friday, 8 a.m. to 6 p.m. Central Standard Time.